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Counsel for Plaintiff
GAIL MORALES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

GAIL MORALES,

Case No. 15-CV-4383-CRB

Plaintiff,

**STIPULATION FOR DISMISSAL OF CERTAIN
INDIVIDUAL DEFENDANTS DONALD CRANE,
DAVID LANSKY, AND DAVID JOYNER,
WITHOUT PREJUDICE**

v.

CAL ECONNECT, INC., et al.,

ORDER

Defendants.

/ [Jury Trial Demanded]

THE PARTIES HERETO, THROUGH COUNSEL OF RECORD, HEREBY AGREE AND
STIPULATE AS FOLLOWS:

This is an employment-related case filed in State Court by Plaintiff Gail Morales on
September 2, 2014.

All named Defendants joined in and consented to removal of the action pursuant to 28
USC section 1446(b)(2), and this action was removed to federal court on September 24, 2015.

The parties hereto, through counsel of record, hereby stipulate pursuant to Federal
Rules of Civil Procedure, Rule 41(a), that the following named defendants shall be dismissed
without prejudice: Donald Crane, David Lansky, and David Joyner.

Each party to this stipulation agrees that in exchange for dismissal, each shall bear
his/her own costs of suit and attorneys' fees expended as to the dismissed defendants, only;
and, that each of the dismissed defendants will appear at deposition pursuant to reasonable
notice and without the need to subpoena or to pay a witness fee, on dates, and at times and

1 places mutually agreed upon. The location of these depositions will be pursuant to Federal
2 Rules of Civil Procedure, Rule 45.

3 After dismissal of these three defendants, the named parties remaining are Plaintiff Gail
4 Morales and Defendants Cal eConnect, Inc., and Laura Landry.

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6 Date: September __, 2015

/s/ Russell A. Robinson
By: Russell A. Robinson
Law Office of Russell A. Robinson
Counsel for Plaintiff
GAIL MORALES

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10 Date: September __, 2015

/s/
By: Lauren M. Cooper, Esq.
Villarreal Hutner PC
Counsel for Defendants
CAL eCONNECT, INC., LAURA LANDRY,
DONALD CRANE, DAVID LANSKY, and
DAVID JOYNER

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ORDER

Good cause appearing, the Court hereby orders as follows:

The parties' stipulation is hereby adopted as the Order of this Court. Pursuant to Federal Rules of Civil Procedure, Rule 41(a), Defendants Donald Crane, David Lansky, and David Joyner shall be and are hereby dismissed from this action, without prejudice: .

Each party to this stipulation shall bear his/her own costs of suit and attorneys' fees expended as to the dismissed defendants, only; and, each of the dismissed defendants will appear at deposition pursuant to reasonable notice to defense counsel and without the need to subpoena or to pay a witness fee, on dates, and at times and places mutually agreed upon.

The location of these depositions will be pursuant to Federal Rules of Civil Procedure, Rule 45.

IT IS SO ORDERED.

Date: October 6, 2015


Honorable CHARLES R. BREYER
Judge, United States District Court